## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF VIRGINIA LYNCHBURG DIVISION

IN RE: FRANK THOMAS DOMBROWSKI CHAPTER 13

CASE NO. 07-61223

Debtor

## Application for Additional Extension of Time to File Chapter 13 Schedules and Chapter 13 Plan

Debtor, by counsel, respectfully represents:

- 1. Debtor filed a voluntary petition under chapter 13 of the Bankruptcy Code on 7/3/07. Pursuant to Rule 1007, all schedules, statements of financial affairs and other required documents were to be filed by 7/18/07.
- 2. Debtor's petition was prepared and filed quickly in order to prevent collection activity. Debtor's counsel was unable to complete and fully review all the necessary documents for completing the chapter 13 paperwork when the petition was filed.
- 3. It is requested that the Court grant the Debtor(s) an extension of time so that counsel and Debtor may properly review and complete the necessary forms, to wit: FORM 22 CURRENT MONTHLY INCOME, SCHEDULES A THROUGH J, SUMMARY, DISCLOSURE OF COMPENSATION, STATEMENT OF FINANCIAL AFFAIRS, and CHAPTER 13 PLAN.
- 4. This application is not made for the purposes of delay and no creditor will suffer any prejudice if Debtor is granted an additional extension of time.
- 5. The undersigned counsel certifies that this Motion and proposed Order have been forwarded to the Chapter 13 Trustee and the Debtor on the date noted below.

WHEREFORE, Debtor(s) request that this Court grant an extension of time until **Friday, July 27, 2007**, in which to file the remaining Chapter 13 Schedules, Statement of Financial Affairs, Disclosure of Compensation, Chapter 13 Plan, Form 22 and Summary.

Date: 7/18/07 /s/ David Cox

Counsel

David Cox Cox Law Group, PLLC Counsel for Debtor(s) 900 Lakeside Drive Lynchburg, VA 24501